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13 Board As Liquidating Agent For Western Corporate Federal Credit Union

14 UNITED STATES DISTRICT COURT  
15 CENTRAL DISTRICT OF CALIFORNIA  
16 WESTERN DIVISION

17 NATIONAL CREDIT UNION  
18 ADMINISTRATION BOARD AS  
19 LIQUIDATING AGENT FOR  
20 WESTERN CORPORATE FEDERAL  
21 CREDIT UNION,

22 Plaintiff,

23 v.

24 ROBERT A. SIRAVO, TODD M. LANE,  
25 ROBERT J. BURRELL, THOMAS E.  
26 SWEDBERG, TIMOTHY T. SIDLEY,  
27 ROBERT H. HARVEY, JR., WILLIAM  
28 CHENEY, GORDON DAMES, JAMES  
P. JORDAN, TIMOTHY KRAMER,  
ROBIN J. LENTZ, JOHN M. MERLO,  
WARREN NAKAMURA, BRIAN  
OSBERG, DAVID RHAMY and  
SHARON UPDIKE,

Defendants.

Case No.: CV10-01597 GW (MANx)

**STIPULATION RE ENTRY OF  
ORDER GOVERNING USE AND  
DISSEMINATION OF  
CONFIDENTIAL INFORMATION**

**[DISCOVERY MATTER]**

1 WHEREAS, plaintiff and counterdefendant the National Credit Union  
 2 Administration Board as Liquidating Agent for Western Corporate Federal Credit  
 3 Union (the "NCUA") and defendants and counterclaimants Robert A. Siravo,  
 4 Thomas E. Swedberg, Timothy T. Sidley, Robert J. Burrell, and Todd M. Lane  
 5 (collectively, the "Officer Defendants"), anticipate that discovery will require them  
 6 to produce documents and information that each deems to be privileged, confidential  
 7 and proprietary; and

8 WHEREAS, the NCUA and the Officer Defendants believe that discovery in  
 9 this matter would be facilitated if the Court were to enter a protective order to  
 10 govern the dissemination and use of privileged, confidential and proprietary  
 11 documents and information to be produced in this matter;

12 IT IS STIPULATED by and between the NCUA and the Officer Defendants  
 13 that the Court may enter a protective order in the form attached hereto as Exhibit A.

14  
 15 Dated: November 23, 2011 LUCE, FORWARD, HAMILTON & SCRIPPS LLP  
 16 Michael H. Bierman  
 17 Jeffrey D. Wexler  
 18 Michael E. Pappas

19 By: /s/ Michael H. Bierman  
 20 Michael H. Bierman  
 21 Attorneys for Plaintiff and Counterdefendant  
 22 National Credit Union Administration Board  
 23 As Liquidating Agent For Western Corporate  
 24 Federal Credit Union

25  
 26 Dated: November 23, 2011 ORRICK, HERRINGTON & SUTCLIFFE LLP  
 27 Kent B. Goss  
 28 Seth E. Freilich

By: /s/ Seth E. Freilich  
 Seth E. Freilich  
 Attorneys for Defendant and Counterclaimant  
 Timothy T. Sidley

1 Dated: November 23, 2011

PILLSBURY WINTHROP SHAW PITTMAN LLP  
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Bruce A. Ericson  
Marley Degner

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4 By: /s/ Bruce A. Ericson

5 Bruce A. Ericson  
6 Attorneys for Defendant and Counterclaimant  
Robert John Burrell

7 Dated: November 23, 2011

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Richard E. Drooyan  
Laura Smolowe

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10 By: /s/ Richard E. Drooyan

11 Richard E. Drooyan  
12 Attorneys for Defendants and Counterclaimants  
Robert A. Siravo and Thomas E. Swedberg

13 Dated: November 23, 2011

14 CHAPIN FITZGERALD SULLIVAN & BOTTINI  
LLP  
Kenneth M. Fitzgerald  
Curtis G. Carll

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17 By: /s/ Kenneth M. Fitzgerald

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19 Attorneys for Defendant and Counterclaimant  
Todd M. Lane

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